



U.S. Department of Justice

United States Attorney
Eastern District of New York

ICR/AFM/KCB
F. #2018R01047

271 Cadman Plaza East
Brooklyn, New York 11201

February 11, 2021

By Email and ECF

Samuel M. Braverman
Albert Y. Dayan
Kenneth J. Kaplan
Joel M. Stein
Geoffrey R. Kaiser
Todd D. Greenberg
John S. Wallenstein
Richard D. Willstatter

Re: United States v. Jack Cabasso, et al.
Criminal Docket No. 19-CR-582 (DRH)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, and subject to the terms of the Protective Order entered by the Court on May 29, 2020 (the “Protective Order”), the government hereby furnishes additional discovery with respect to the above-referenced matter. This disclosure supplements the government’s earlier disclosures of Rule 16 discovery produced to individual defendants on January 14, 2020, and November 18, 2020, and to all defendants on June 24, 2020, July 2, 2020, July 10, 2020, July 31, 2020, September 17, 2020, October 16, 2020, November 24, 2020 and December 17, 2020. The government renews its request for reciprocal discovery from the defendants.

The government is providing the discovery described below to the defendants via the USAfx encrypted electronic file transfer system. Please note that certain of the items in this production have been designated as **Sensitive Discovery Material** pursuant to the Protective Order.

Description	Bates Number
Documents, including contracts, from the United States Army, designated as Sensitive Discovery Material	AVENTURA_0000081310- AVENTURA_0000081621

Description	Bates Number
Documents, including contracts and travel records, from United States Customs and Border Protection, designated as Sensitive Discovery Material	AVENTURA_0000081622- AVENTURA_0000081721
A report of investigation by the United States Department of Commerce	AVENTURA_0000081722- AVENTURA_0000081724
Documents, including payment records and invoices, from the United States Defense Finance and Accounting Service, designated as Sensitive Discovery Material	AVENTURA_0000081725- AVENTURA_0000082059
Documents, including contract files, from the United States Department of State, designated as Sensitive Discovery Material	AVENTURA_0000082060- AVENTURA_0000082062
Documents, including surveillance and other reports, from the Department of Defense Criminal Investigative Service	AVENTURA_0000082063- AVENTURA_0000082157; AVENTURA_0000082359- AVENTURA_0000082372
Documents, including reports and payment records, from the Department of Defense Criminal Investigative Service, designated as Sensitive Discovery Material	AVENTURA_0000082158- AVENTURA_0000082358
Documents from the Department of the Interior	AVENTURA_0000082373- AVENTURA_0000082444
Documents, including reports and notes, from the Department of the Interior, designated as Sensitive Discovery Material	AVENTURA_0000082445- AVENTURA_0000082466
Documents, including reports, contract files, photographs and email communications, from the Department of Energy, designated as Sensitive Discovery Material	AVENTURA_0000082467- AVENTURA_0000083600
Documents, including reports, contract files, photographs and email communications, from the General Services Administration, designated as Sensitive Discovery Material	AVENTURA_0000083601- AVENTURA_0000089720
A report from the General Services Administration	AVENTURA_0000089721- AVENTURA_0000089722
Email correspondence with the United States Air Force	AVENTURA_0000089723- AVENTURA_0000089826
Documents, including reports, email communications, color photographs and contract files, from the United States Air Force, designated as Sensitive Discovery Material	AVENTURA_0000089827- AVENTURA_0000091009
Payment records and color photographs from the United States Department of the Treasury	AVENTURA_0000091010- AVENTURA_0000091128
Contracts and related files from the United States Department of the Treasury, designated as Sensitive Discovery Material	AVENTURA_0000091129- AVENTURA_0000092511

Description	Bates Number
Color photographs from the United States Department of the Navy	AVENTURA_0000092512-AVENTURA_0000092525
Contracts, emails and related files from the United States Department of the Navy, designated as Sensitive Discovery Material	AVENTURA_0000092526-AVENTURA_0000094700

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

SETH D. DuCHARME
Acting United States Attorney

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Enclosure

cc: Clerk of the Court (DRH) (by ECF) (without enclosures)